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1	Christopher A. Carr (Bar #44444)		
2	ccarr@afret.com		
	Viddell Lee Heard (#175049) vheard@afrct.com		
3	ANGLIN, FLEWELLING, RASMUSSEN,		
4	CAMPBELL & TRYTTEN LLP		
5	199 S. Los Robles Ave., Ste. 600 Pasadena, CA 91101-2459		
6	Tel: (626) 535-1900; Fax: (626) 577-7764		
7	Attorneys for Defendant		
o	WELLS FARGO BANK, N.A., successor		
8	by merger with Wells Fargo Bank Southwest, N.A., f/k/a Wachovia Mortgage,		
9	FSB, f/k/a World Savings Bank, FSB ("Wells Fa	rgo")	
10	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION		
12	NORTHERN DISTRICT OF CALIFOR		
13	NADER SHATERIAN,	CASE NO.: 3:11-cv-00920-SC	
	Plaintiff,	[Assigned to the Honorable Samuel Conti.,	
14	,	Courtroom 1]	
15	VS.	STIPULATION TO EXTEND TIME TO	
16	WELLS FARGO BANK, NATIONAL	RESPOND TO SECOND AMENDED	
	ASSOCIATION; CAL-WESTERN	COMPLAINT	
17	RECONVEYANCE CORPORATION; and	Data: Santambar 2 2011	
18	DOES 1-50, inclusive,	Date: September 2, 2011 Time: 10:00 a.m.	
19	Defendants.	Courtroom: 1, 17 th Floor	
20			
21			
22			
23			
24	Defendant Wells Fargo Bank, N.A., successor by merger with Wells Fargo Bank		
25	Southwest, N.A., formerly known as Wachovia Mortgage, FSB, formerly known as World		
26	Savings Bank, FSB ("Wells Fargo") present the following stipulation extending the time for		
27	defendants to respond to Plaintiff Nader Shaterian's Second Amended Complaint.		
28			
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1	STIPULATION		
2	Plaintiff and defendant Wells Fargo, by and through their respective counsel, hereby		
3	stipulate and request the Court to approve that Wells Fargo shall have up to and including		
4	September 2, 2011 in which to respond to Plaintiff's Second Amended Complaint.		
5			
6	Respectfully submitted,		
7 8	Dated: August 19, 2011 ANGLIN, FLEWELLING, RASMUSSEN, CAMPBELL & TRYTTEN LLP		
9			
10	By: <u>/s/ Viddell Lee Heard</u> Viddell Lee Heard		
11	Attorneys for Defendant		
12	WELLS FARGO BANK, N.A., successor by merger with Wells Fargo Bank		
13	Southwest, N.A., f/k/a Wachovia Mortgage, FSB, f/k/a World Savings Bank, FSB		
14			
15	D. 1. A 10. 2011		
16	Dated: August 19, 2011 BLOOMFIELD LAW GROUP, INC. A Professional Corporation		
17			
18	By: <u>/s/ Neil Jon Bloomfield</u> Neil Jon Bloomfield		
19	Attorneys for Plaintiff Nader Shaterian		
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	CASE NO.: 3:11-CV-00920-SC		

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1		
2	DECLARATION OF CONSENT	
3	Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest under penalty of	
4	perjury that concurrence in the filing of this document has been obtained from the above-listed	
5	counsel for Plaintiff Neil Jon Bloomfield.	
6	August 19, 2011	
7	<u>/s/ Viddell Lee Heard</u> Viddell Lee Heard	
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ORDER

PURSUANT TO STIPULATION OF THE PARTIES, IT IS HEREBY ORDERED that the stipulation to extend the time in which to respond to the Second Amended Complaint to September 2, 2011 has been granted.

Dated: 8/22/11



1	<u>CERTIFICATE OF SERVICE</u>	
234	I, the undersigned, declare that I am over the age of 18 and am not a party to this action. I am employed in the City of Pasadena, California; my business address is Anglin, Flewelling, Rasmussen, Campbell & Trytten LLP, 199 S. Los Robles Avenue, Suite 600, Pasadena, California 91101-2459.	
5	On the date below, I served a copy of the following document entitled:	
6	STIPULATION TO EXTEND TIME TO RESPOND TO SECOND AMENDED COMPLAINT	
7	on all interested parties in said case addressed as follows:	
8		
9	Served Electronically via Court's CM/ECF System: Counsel for Plaintiff Counsel for Defendant,	
10	Neil Jon Bloomfield, Esq. CAL-WESTERN RECONVEYANCE Randall L. Hornibrook, Esq. CORPORATION	
11	BLOOMFIELD LAW GROUP, INC. 901 E. St., Ste. 100 Robin Prema Wright, Esq.	
12	San Rafael, CA 94901 Nicole K. Neff, Esq. WRIGHT, FINLAY & ZAK, LLP	
13	njbloomfield@njblaw.com 4665 MacArthur Ct., Ste. 280 Newport Beach, CA 92660	
14	Tel: 415.454.2294 Fax: 415.457.5348	
15	Nicole Kimberly Neff nneff@wrightlegal.net,	
16	<u>sbennett@wrightlegal.net</u>	
17	Robin Prema Wright rwright@wrightlegal.net,	
18	ggrant@wrightlegal.net	
19	Tel: 949.477.5050 Fax: 949.477.9200	
20	☐ (BY MAIL): I am readily familiar with the firm's practice of collection and processing	
21	correspondence by mailing. Under that same practice it would be deposited with U.S. Postal Service on that same day with postage fully prepaid at Pasadena, California in the ordinary	
22	course of business. I am aware that on motion of the party served, service is presumed invalid if	
23	postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.	
24	I declare under penalty of perjury under the laws of the United States of America that	
25	the foregoing is true and correct. I declare that I am employed in the office of a member of the	
26	Bar of this Court at whose direction the service was made. This declaration is executed in Pasadena, California, on August 19, 2011.	
27		
	Christine Daniel /s/ Christine Daniel	
28	(Print name) (Signature)	